

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

BCI Acrylic, Inc.	§
	§
Plaintiff,	§
	§
v.	§
	§ Case No. 23-cv-00908-JPS
Milestone Bath Products Inc.	§
(d/b/a Bellastone Bath Systems); and	§
TightSeal Exteriors And Bath	§
	§
Defendants.	§
	§

**JOINT STIPULATION
REGARDING DEPOSITION OF JEFF WHITLEY**

WHEREAS on October 2, 2023 the Court ordered the parties to complete limited discovery on the issue of standing within 60 days, i.e. December 1, 2023 (ECF 22);

WHEREAS the parties have served and responded to written discovery requests and have produced documents on the issue of standing;

WHEREAS on November 10, 2023, Plaintiff requested dates that the alleged co-inventor, Jeff Whitley, is available for deposition;

WHEREAS Defendants informed Plaintiff that they intend to submit a declaration from Mr. Whitley in support of a motion to dismiss that they intend to file on December 1, 2023; and

WHEREAS Plaintiff wishes to depose Mr. Whitley regarding the substance of his forthcoming declaration, the parties wish to avoid multiple depositions of Mr. Whitley on the issue of standing, and Defendants have agreed to produce Mr. Whitley for deposition on December 6, 2023.

IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that Plaintiff may take the deposition of Jeff Whitley after Defendants serve the declaration of Jeff Whitley on December 1, 2023.

Dated: November 27, 2023

/s/Erik Halverson

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